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ATTORNEYS FOR DEFENDANTS
GM FARM HOLDINGS, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

WAYBACK FRANCHISING LLC, a
Delaware limited liability company,

Plaintiff,

v.

MGHA RESTAURANTS, INC., a
terminated California corporation; MOSA
GAZALI, an individual; HUSEIN
ALAMOUDI, an individual; MSG MAIN
STREET INC., a California corporation;
KHALID ABDULQAWAI, an individual;
OMAR ABDULQAWAI, an individual; GM
FARM HOLDINGS, LLC, a California
limited liability company; and DANA
BUTCHER ASSOCIATES, a California
corporation,

Defendants.

CASE NO. 1:25-CV-00318-KES-BAM

~~[PROPOSED]~~ STIPULATION AND
ORDER FOR DEFENDANT AND CROSS-
CLAIMANT GM FARM HOLDINGS, LLC
TO FILE ITS FIRST AMENDED
CROSSCLAIM

1 GM FARM HOLDINGS, LLC, a California
2 limited liability company,

3 Cross-Claimant,

4 v.

5 DANA BUTCHER ASSOCIATES, a
6 California corporation; MOSA GAZALI, an
7 individual; HUSEIN ALAMOUDI, an
8 individual; WALEED ABDULQAWI, an
9 individual; HAFED ALWAJIH, an
10 individual; KHALID ABDULQAWI, an
11 individual; and OMAR ABDULQAWI, an
12 individual,

13 Cross-Defendants.

14 AND ALL RELATED CROSS-ACTIONS

15 ALL PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD,
16 STIPULATE AND AGREE AS FOLLOWS:

17 1) Defendant and Crossclaimant GM Farm Holdings, LLC, intends to make
18 technical corrections to its crossclaim. Those changes are limited to the "Third
19 Crossclaim for Relief" and the prayer. Neither the numbering of the paragraphs in the
20 amended crossclaim nor the exhibits will change.

21 2) Counsel for all parties have reviewed the proposed first amended
22 crossclaim, and stipulate that it may be filed as provided in this stipulation and order.

23 3) Defendant and Crossclaimant GM Farm Holdings, LLC, may file its first
24 amended crossclaim in the form attached hereto as Exhibit A, with all exhibits to the first
25 amended crossclaim being identical to those attached to the original crossclaim.

26 4) In order to avoid unnecessary time and expense, the answer of each
27 cross-defendant to the original crossclaim will be deemed to be their answer to the first
28 amended crossclaim unless a cross-defendant files a new answer to the first amended
crossclaim within the time period prescribed by F.R.Civ.P 12(a)(1)(B).

IT IS SO STIPULATED AND AGREED:

DATED: OCTOBER 28, 2025

COLEMAN & HOROWITT, LLP

BY: /s/ SHERRIE FLYNN

DARRYL J. HOROWITT

SHERRIE FLYNN

AISHA O. OTORI

ATTORNEYS FOR PLAINTIFF,

WAYBACK FRANCHISING LLC, A DELAWARE

LIMITED LIABILITY

DATED: OCTOBER 28, 2025

ZELMS ERLICH LENKOV

BY: /s/ CURTIS A. GOLE

CURTIS A. GOLE

RINAT Klier ERlich

ATTORNEYS FOR DEFENDANT,

DANA BUTCHER ASSOCIATES

DATED: OCTOBER 28, 2025

LAW OFFICE OF LANCE E. ARMO

BY: /s/ LANCE ARMO

LANCE E. ARMO

PAUL S. ARMO

ATTORNEYS FOR DEFENDANTS, MGHA

RESTAURANTS, INC., MOSA GAZALI, HUSEIN

ALAMOUDI, KHALID ABDULDQAWAI, OMAR

ABDULQAWAI, AND MSB MAIN STREET INC.

DATED: OCTOBER 28, 2025

BERLINER COHEN, LLP

BY: /s/ MICHAEL B. IJAMS

MICHAEL B. IJAMS

LINDSAY I. WALCZAK

ATTORNEYS FOR DEFENDANT/CROSS CLAIMANT

GM FARM HOLDINGS, LLC

ORDER

The Court having reviewed the stipulation of the parties, and good cause appearing, **IT IS SO ORDERED**. It appears that all parties have reviewed the first amended crossclaim and stipulate that it may be filed. Defendant and Crossclaimant GM Farm Holdings, LLC, may file its first amended crossclaim within five days of the entry of this order. The first amended crossclaim must be full and complete in and of itself, including all exhibits, without reference to the prior or superseded pleading. Local Rule 220.

IT IS SO ORDERED.

Dated: October 30, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE